



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
400 RALPH PILL MARKETPLACE  
22 BRIDGE STREET  
CONCORD, NEW HAMPSHIRE 03301-4901

March 25, 1992

Ms. Meghan Cassidy  
U.S. EPA Waste Management Division  
J.F. Kennedy Federal Office Building  
Boston, Massachusetts 02203

Dear Ms. Cassidy:

We have reviewed the draft Records of Decision (ROD) on the Brunswick Naval Air Station Sites 1/3, and the Eastern Plume. We offer the following comments for your consideration.

The Eastern Plume

The Eastern Plume is an area of contaminated groundwater, predominantly with VOCs. Since VOCs do not generally persist in the aquatic environment, and are rapidly metabolized and excreted by organisms, we do not expect them to be significantly injurious to aquatic organisms at the concentrations reported. We, therefore, have no objection to the proposed remedy for the contamination in this area.

~~Sites 1 and 3~~

The actual landfill sites are relatively barren areas that offer limited habitat to wildlife species. Remedial actions for the landfills appear to us to be satisfactory in protecting natural resources under our jurisdiction, and it is our opinion that no mitigation is necessary. However, the Mere Brook system, which runs adjacent to the landfill sites, provides habitat for a variety of migratory bird species, as well as mammals, reptiles, and amphibians. ~~Leachates from the landfills have contaminated Mere Brook with PAHs, mercury, lead, and zinc. As we understand it, the only remedial action planned for Mere Brook is to cease contaminated discharges by containment of the landfills, and to continue to monitor the brook system.~~ Given the bioaccumulation/magnification potential of mercury, and the toxicity of some of the PAH compounds, it is our opinion that the Mere Brook system should receive more attention. Specifically, we suggest the following:

1. Mercury levels in sediments by leachate seeps were found to be as high as 3.3 mg/kg. We suggest that "hot spot" clean up would be appropriate. The target clean up level of 1 mg/kg is acceptable. Further, PAH levels were found to be as high as 7,000 ug/kg in sediments of the old beaver marsh on Mere Brook (short distance downstream from the landfills). "Hot spot" clean up should be considered for PAHs as well as mercury. We presume that a suitable target clean up level will need to be determined.

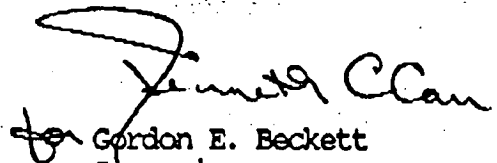
2. Water quality parameters, such as pH, DO, hardness, as well as grain size and total organic content of the sediments, should be measured in Mere Brook such that the biological availability of some of the heavy metals can be estimated.

3. In our letter to you dated May 8, 1990, we suggested biological sampling, principally of macroinvertebrates, in Mere Brook to more clearly identify impacts to the biological community rather than predicting biological impacts based on sediment, water samples, and computer modeling. We cite the Charles George Superfund site as an example of where the biological community was found to be more contaminated than sediment sampling would have suggested. We continue to recommend biological sampling, and should EPA decide that no further remediation is necessary in Mere Brook, we feel it is particularly important to provide biological data to support this position. Sampling of biota from locations of sediment accretion along the entire length of Mere Brook (from Sites 1&3 to the confluence with Harpswell Cove) would provide the greatest confidence that living resources are secure.

In summary, we believe the remediation proposed for the Eastern Plume is protective of living natural resources. The proposed remedy for Sites 1 and 3 satisfies our concerns for jurisdictional natural resources on the site proper, however, we do not believe that the record supports the continued security of the biological community at risk in and around Mere Brook.

We appreciate the opportunity to comment. If you have any questions, please contact Laura Eaton at 603-225-1411 (FTS 834-4411).

Sincerely yours,

  
for Gordon E. Beckett  
Supervisor  
New England Field Offices